

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF VIRGINIA
Richmond Division**

TAMICA N. ANDERSON, DIANA B.)
JOHNSON, BRENDA J. MARRIOTT,)
ERNEST B. NOVELLO, and JENNIFER SCOTT,)
on behalf of themselves and all similarly)
situated individuals,)

Plaintiffs,

v.

PORTFOLIO RECOVERY ASSOCIATES, LLC)
)
Defendant.)

Civil Action No. 3:11cv604

**PLAINTIFFS' MEMORANDUM IN SUPPORT OF THEIR CONSENT MOTION FOR
AN EXTENSION OF TIME TO FILE THEIR BRIEF IN OPPOSITION TO
DEFENDANT'S MOTION FOR JUDGMENT ON THE PLEADINGS**

Plaintiffs, by counsel and with consent of the Defendant, respectfully move the Court for an Extension of Time to File their Brief in Opposition to Defendant's Motion for Judgment on the Pleadings (Docket No. 21). Plaintiffs submit this Memorandum in support of their Motion.

The Defendant filed its Motion for Judgment on the Pleadings on July 2, 2012, and Plaintiff's response was originally due on July 16, 2012. However, the Court granted the Plaintiffs an extension until July 24, 2012 to file their brief in opposition to the Defendant's motion. With consent of the Defendant, the Plaintiffs now seek an extension until August 7, 2012 to file their brief. The parties have been working diligently to settle this case, and are now in the late stages of settlement discussions. At this juncture, the parties are negotiating the final terms of a proposed settlement and anticipate reaching final agreement shortly. The Plaintiffs do not seek this extension for a dilatory purpose, nor will either party be prejudiced by a two-week extension. The parties have acted in good faith with respect to their commitment to reaching a

resolution of these claims without expending unnecessary judicial resources, but require a bit more time to reach complete agreement.

WHEREFORE, Plaintiffs respectfully request that the Court grant their Consent Motion for Extension of Time to File their Brief in Opposition to Defendant's Motion for Judgment on the Pleadings (Docket No. 21), and to extend their deadline to submit their response on or before August 7, 2012 in the unlikely event that it becomes necessary for them to do so.

Respectfully submitted,
TAMICA N. ANDERSON,
DIANA B. JOHNSON,
BRENDA J. MARRIOTT,
ERNEST B. NOVELLO, and
JENNIFER SCOTT *on behalf of themselves and*
all similarly situated individuals

By _____ /s/ _____
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CERTIFICATE OF SERVICE

I hereby certify that on the 26th day of July, 2012, I will electronically file the foregoing with the Clerk of Court using the CM/ECF system, which will then send a notification of such filing (NEF) to the following:

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